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5 *Attorney for Defendant*  
*National Consumer Telecom & Utilities*  
6 *Exchange, Inc.*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 MELVIN WASHINGTON,

11 Plaintiff,

12 vs.

13 NATIONAL CONSUMER TELECOM &  
14 UTILITIES EXCHANGE, INC.; INNOVIS  
DATA SOLUTIONS, INC.; CLARITY  
15 SERVICES, INC. and  
16 BACKGROUNDCHECKS.COM LLC,

17 Defendants.

**Case No. 2:24-cv-01618-JAD-DJA**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE, INC. TO FILE ANSWER**

**FIRST REQUEST**

18 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has  
19 requested an extension of time to answer, move or otherwise respond to the Complaint in this  
20 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY  
21 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or  
22 otherwise respond to the Complaint in this action is extended from September 27, 2024 through  
23 and including **October 28, 2024**. The request was made by NCTUE so that it can have an

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1 opportunity to collect and review its internal files pertaining to the allegations in the Complaint,  
2 and Plaintiff approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 25th day of September, 2024.

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5 CLARK HILL PLLC

6 By: /s/Gia N. Marina  
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13 *Attorney for Defendant National Consumer*  
14 *Telecom & Utilities Exchange, Inc.*

**No opposition**

/s/ Gerardo Avalos  
George Haines, Esq.  
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Gerardo Avalos  
Nevada Bar No. 15171  
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*Attorneys for Plaintiff*

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18 IT IS SO ORDERED:

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20 \_\_\_\_\_  
21 United States Magistrate Judge

22 DATED: 9/26/2024  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served this 25th day of September, 2024, via CM/ECF, upon all counsel of record:

By: /s/Gia N. Marina  
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